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Subject: Specification Clarification LSA 17-270
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To: Bauder, Kelly kbauder@doe.in.gov



Kelly,

The original language for the specification for the seat belt cutter, brake light, and backup lights was confusing in its original intent:

Cutter language

575 IAC 1-9-7 Belt cutter

Authority: IC 20-27-3-4

Affected: IC 20-27-9

Sec. 7. (a) All buses must be equipped with a seat belt cutter.

(b) The seat belt cutter must have a full-width handgrip, designed with a protective blade to minimize risk to the operator or others during use.

(c) The seat belt cutter must be located and secured in the driver's compartment, within the driver's reach at all times while the driver is seated in the driver's seat.

(d) The seat belt cutter may not be located in the first-aid kit.

(e) If a seat belt cutter is located in a compartment, the compartment must be labeled with the words "Seat Belt Cutter" or similar description.

(f) On a bus equipped with a lift, a seat belt cutter must be placed as near as possible to the lift location in such manner as to be non-accessible to children.

(g) in addition to the required seat belt cutter in section (a), a bus may have one additional cutter to be located

Brake light and backup lights

575 IAC 1-9-49 Lamps and signals; rear

Authority: IC 20-27-3-4

Affected: IC 20-27-9

Sec. 49. (a) Each bus must have four (4) combination red brake tail lamps. Two (2) combination lamps with a minimum diameter of seven (7) inches (or if a shape other than round, a minimum of thirty-eight (38) square inches of illuminated area) must be mounted on the rear of the bus, next to the turn signals. Two (2) combination lamps with a minimum diameter of four (4) inches (or if a shape other than round, a minimum of twelve (12) square inches of illuminated area) must be placed on the rear of the body between the belt line and the floor line.

(b) Each bus must have two (2) tail and brake lamps, each with a diameter of three and three-fourths (3 3/4) inches and two (2) tail and brake lamps, each with a diameter of seven (7) inches (or if a shape other than round, a minimum of thirty-eight (38) square inches of illuminated area), that emit a red light that is visible for five hundred (500) feet during normal weather conditions. Tail lamps must be mounted on the bus at least forty (40) inches from the center of the lamp to the ground. The tail lamps must be:

- (1) placed below the window line; and
- (2) spaced at least five (5) feet apart.

(c) Brake lamps must have at least the intensity of the Class A turn signal lamps as established by the Society of Automotive Engineers (SAE). Stop lamps must emit a steady light when illuminated.

Buses with bodies supplied by chassis manufacturer may have manufacturer's standard stop and tail lamps.

(d) each bus may have an additional brake lights in addition to the red brake tail lamps in section a of this section.

(e) Each bus must have two (2) but may have a total of four (4) backup lights

(f) The rear of the bus must have seven (7) inch Class A amber turn signals (or if a shape other than round, a minimum of thirty-eight (38) square inches of illuminated area) that meet SAE standards. The front and rear turn signals must be mounted as high as practical and placed as wide apart as practical but not less than three (3) feet. The rear turn signal lamps' centerline must be at least eight (8) inches below the rear windows. Conversion vehicle lamps must be at least twenty-one (21) square inches in lens area. These signals must be independent units and have a four-way hazard warning switch that causes simultaneous flashing of the turn signal lamps when they are needed as a hazard warning.

(g) Backup lights may come on when rear door is opened.

It was felt by the committee that the language was not precise enough for the state police and districts to understand and thus implement effectively, so the language was modified throughout the rulemaking process to give more clarity, without any additional financial impact.

The final language gave more precise locations for the seat belt cutter and the additional seat belt cutter for a lift bus and remove extraneous language to further simplify the language as evidenced by the state school bus committee approved language below:

575 IAC 1-9-7 Belt cutter

Sec. 7. (a) All buses must be equipped with a seat belt cutter.

(b) The seat belt cutter must have a full-width handgrip, designed with a protective blade to minimize risk to the operator or others during use.

(c) The seat belt cutter must be located and secured in the driver's compartment, within the driver's **view and** reach at all times while the driver is seated in the driver's seat.

(d) The seat belt cutter must be secured using a positive fastening method.

~~(de) The seat belt cutter may not be located in the first-aid kit.~~

~~(e) If a seat belt cutter is located in a compartment, the compartment must be labeled with the words "Seat Belt Cutter" or similar description.~~

~~(ef) On a bus equipped with a lift, an **additional** seat belt cutter must be **secured** placed as near as possible to the lift location in such manner as to be nonaccessible to children.~~

During the public hearing it was pointed out that the companies that build school buses felt the language for the additional brake contravened the requirements under FMVS 108 and so that language was struck. The language for the additional backup lights – which could also be called auxiliary light when mounted underneath the bus – was simplified and also the auxiliary terminology was added to be more precise about the light depending on the mounting location:

575 IAC 1-9-49 Lamps and signals; rear

Sec. 49. (a) Each bus must have four (4) combination red brake tail lamps. Two (2) combination lamps with a minimum diameter of seven (7) inches (or if a shape other than round, a minimum of thirty-eight (38) square inches of illuminated area) must be mounted on the rear of the bus, next to the turn signals. Two (2) combination lamps with a minimum diameter of four (4) inches

(or if a shape other than round, a minimum of twelve (12) square inches of illuminated area) must be placed on the rear of the body between the belt line and the floor line.

(b) Each bus must have two (2) tail and brake lamps, each with a diameter of three and three-fourths (3 3/4) inches and two (2) tail and brake lamps, each with a diameter of seven (7) inches (or if a shape other than round, a minimum of thirty-eight (38) square inches of illuminated area), that emit a red light that is visible for five hundred (500) feet during normal weather conditions. Tail lamps must be mounted on the bus at least forty (40) inches from the center of the lamp to the ground. The tail lamps must be:

- (1) placed below the window line; and
- (2) spaced at least five (5) feet apart.

(c) Brake lamps must have at least the intensity of the Class A turn signal lamps as established by the Society of Automotive Engineers (SAE). Stop lamps must emit a steady light when illuminated. Buses with bodies supplied by chassis manufacturer may have manufacturer's standard stop and tail lamps.

(d) Each bus must have two (2) backup lights.

(e) The rear of the bus must have seven (7) inch Class A amber turn signals (or if a shape other than round, a minimum of thirty-eight (38) square inches of illuminated area) that meet SAE standards. The front and rear turn signals must be mounted as high as practical and placed as wide apart as practical but not less than three (3) feet. The rear turn signal lamps' centerline must be at least eight (8) inches below the rear windows. Conversion vehicle lamps must be at least twenty-one (21) square inches in lens area. These signals must be independent units and have a four-way hazard warning switch that causes simultaneous flashing of the turn signal lamps when they are needed as a hazard warning.

(f) Backup lights may come on when rear door is opened.

(g) Two (2) additional backup (auxiliary) lamps may be installed per manufacturer specification.

~~**(h) One additional brake lamp may be attached on the rear bumper at the longitudinal centerline of the bumper; or**~~

~~**(1) between the top of the rear bumper and the bottom of the emergency door;**~~

~~**(2) between the engine compartment door and rear bumper for a Type D rear engine**~~

~~**bus.**~~

I hope this explains in more detail the reasons behind the changes from the original language and the final approved language. There is no financial impact due to these changes.

Mike

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Director of School Transportation

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